

Melissa N. Licker
McCalla Raymer Leibert Pierce, LLC
485F US Highway 1 S
Suite 300
Iselin, NJ 08830
Telephone: 732-902-5399
NJ_ECF_Notices@McCalla.com
Attorneys for Movant

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Noami V Patterson	Case No. 20-16593-JKS
Debtor.	Judge: John K. Sherwood

CREDITOR'S CERTIFICATION OF DEFAULT

Chastity Wilson certifies as follows:

1. I am a Assistant Secretary for Nationstar Mortgage LLC, a secured creditor of the debtor (the "Movant").
dba Mr. Cooper
2. On March 18, 2021, an Order was entered, a copy of which is attached as an exhibit, providing for the cure of post-petition arrearages, and in default of such monthly payments for a thirty (30) day period, allowing the Movant ex parte relief to vacate the stay, with notice to the trustee, debtor and his attorney, if any.
3. Debtor has failed to comply with the aforesaid order:
☒ By missing payments and/or by failing to make the correct payments as summarized on the attached Certification of Creditor Regarding Post Petition Payment History.
☐ Other _____.
4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay.
5. I certify under penalty of perjury that the above is true.

June 9, 2021

Date

Chastity Wilson
Signature

Chastity Wilson
Assistant Secretary of Nationstar Mortgage LLC
d/b/a Mr. Cooper
Affiant

Melissa N. Licker
McCalla Raymer Leibert Pierce, LLC
485F US Highway 1 S
Suite 300
Iselin, NJ 08830
Telephone: 732-902-5399
NJ_ECF_Notices@McCalla.com
Attorneys for Movant

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Noami V Patterson	Case No. 20-16593-JKS
Debtor.	Judge: John K. Sherwood

**CERTIFICATION OF CREDITOR REGARDING POST-PETITION PAYMENT
HISTORY (NOTE AND MORTGAGE DATED OCTOBER 5, 2006)**

Chastity Wilson of full age, employed as Assistant Secretary by
Nationstar Mortgage LLC dba Mr. Cooper, hereby certifies the following information:

Recorded on November 1, 2006, in Hudson County, in Book 15067, at Page 00023

Property Address: 14 Manhattan Avenue, Jersey City, NJ 07307

Mortgage Holder: Nationstar Mortgage LLC d/b/a Mr. Cooper

Mortgagors / Debtor: Naomi Patterson / Naomi V Patterson

POST-PETITION PAYMENTS (petition was filed: 5/16/2020)

	Amount Due	Date Payment was due	How Payment was Applied	Amount Received	Date Payment Received	Check or Money Order No.
Agreed order entered March 18, 2021						
1	\$8,000.00	3/31/21	n/a	n/a	n/a	
2	\$2,789.95	4/1//21	n/a	n/a	n/a	
3	\$2,789.95	5/1/21	n/a	n/a	n/a	
TOTAL	\$13,579.90			\$0.00		

Chastity Wilson
Assistant Secretary of Nationstar Mortgage LLC
d/b/a Mr. Cooper
Affiant



Phillip Raymond
McCalla Raymer Leibert Pierce, LLC
485F US Highway 1 S
Suite 300
Iselin, NJ 08830
Telephone: (732) 902-5399
NJ_ECF_Notices@mccalla.com
Attorneys for Secured Creditor

Order Filed on March 17, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

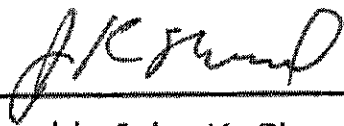
In re:	Chapter 13
Noami V Patterson,	Case No. 20-16593-JKS
	Hearing Date:
Debtor.	Judge: John K. Sherwood

**CONSENT ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND PROVIDING FOR CURE OF POST-PETITION
ARREARS**

The relief set forth on the following pages, number two (2) through three (3) is hereby

ORDERED

DATED: March 17, 2021



Honorable John K. Sherwood
United States Bankruptcy Court

Page 2

Debtor: Naomi V Patterson
Case No.: 20-16593-JKS
Caption of Order: **CONSENT ORDER RESOLVING SECURED CREDITOR'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AND PROVIDING FOR CURE OF POST-PETITION
ARREARS**

THIS MATTER having been opened to the Court upon the Creditor's Certification of Default filed by Nationstar Mortgage LLC d/b/a Mr. Cooper ("Movant"), and Naomi V Patterson ("Debtor") having filed opposition thereto, with respect to the property known as 14 Manhattan Avenue, Jersey City, NJ 07307, and the Court noting the consent of the parties to the form, substance, and entry of the within Order, and for good cause shown ORDERED that:

ORDERED AS FOLLOWS:

1. Debtor is delinquent four (4) post-petition payments due December 1, 2020 through March 1, 2021. Each payment is in the amount of \$2,789.95, less suspense of \$30.00, for a total delinquency of \$11,129.80.
2. Debtor shall make a lump sum payment to Movant towards the arrears in secured funds in the amount of \$8,000.00 no later than March 31, 2021.
3. Debtor shall file a Modified Chapter 13 Plan within fourteen (14) days of entry of this Order to include delinquency in the amount of \$3,129.80.
4. In the event that Debtor does not comply with any of the above the requirements, Movant may submit an order providing relief from the automatic stay without further application to the Court.
5. Debtor shall resume post-petition payments to be paid timely and in full with the April 1, 2021 payment.

Page 3

Debtor: Naomi V Patterson
Case No.: 20-16593-JKS
Caption of Order: **CONSENT ORDER RESOLVING SECURED CREDITOR'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AND PROVIDING FOR CURE OF POST-PETITION
ARREARS**

6. If Debtor should default and fail to make future post-petition payments to Movant that come due during the pendency of this case for thirty (30) days from the due date, Movant's counsel may submit a certification of default and the Court may enter an Order vacating the automatic stay permitting Movant to proceed with its action against the real property known as 14 Manhattan Avenue, Jersey City, NJ 07307.
7. Upon dismissal, discharge chapter conversion, or relief from stay, the foregoing terms and conditions shall cease to be binding payments will be due pursuant to the terms of the original loan agreement and Movant may proceed to enforce its remedies under applicable non-bankruptcy law against the real property and/or against the Debtor.
8. Debtor shall pay attorney fees and costs for the motion for relief in the amount of \$538.00 to be paid as an administrative claim through the plan.

Consent to Form and Entry

McCalla Raymer Leibert Pierce, LLC
Attorney for the Secured Creditor

By: 
Philip Raymond

Date: 3.15.2021

Attorney for the Debtor

By: 
Herbert B. Raymond

Date: 3/12/21

Melissa N. Licker
McCalla Raymer Leibert Pierce, LLC
485F US Highway 1 S
Suite 300
Iselin, NJ 08830
Telephone: 732-902-5399
NJ_ECF_Notices@McCalla.com
Attorneys for Movant

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Noami V Patterson	Case No. 20-16593-JKS
Debtor.	Judge: John K. Sherwood

CERTIFICATION OF SERVICE

1. I, Shelly M. Rodriguez:

- ☐ represent the _____ in the above-captioned matter.
- ☒ am the secretary/paralegal for McCalla Raymer Leibert Pierce, LLC who represents the Movant.
- ☐ am the _____ in the above case and am representing myself.

2. On 6/28/2021, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Certification of Default
- Certification of Post-Petition Payment History
- Order

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

6/28/2021
Date

/s/Shelly M. Rodriguez
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Marie-Ann Greenberg Standing Chapter 13 Trustee 30 Two Bridges Road Suite 330 Fairfield, NJ 07004	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Name of Electronic Filing (NEF) <input type="checkbox"/> Other NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)
Noami V Patterson 14 Manhattan Avenue Jersey City, NJ 07307	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Name of Electronic Filing (NEF) <input type="checkbox"/> Other NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)
Herbert B. Raymond 7 Glenwood Ave Suite #408, 4th Floor East Orange, NJ 07017	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Name of Electronic Filing (NEF) <input type="checkbox"/> Other NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)

U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other: NEF, per D.N.J. LBR 5005-1(as authorized by court or by rule. Cite the rule if applicable*)
--	--------------	--

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time